



सत्यमेव जयते

भारत सरकार
Government of India
विद्युत मंत्रालय
Ministry of Power
केन्द्रीयविद्युतप्राधिकरण
Central Electricity Authority
नवीकरणीय प्रौद्योगिकी और एकीकरण प्रभाग
Renewable Technology & Integration Division

No. CEA/PLG/RT&I/20/11/2021/

दिनांक/Dated 01.10.2021

To,

Sh. Sanoj Kumar Jha
Secretary, CERC

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विषय: केंद्रीय विद्युत नियामक आयोग (विचलन निपटान तंत्र और संबंधित मामले)
विनियम, 2021 के मसौदा पर टिप्पणियाँ.

Sub: Comments on Draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021 – reg.

Reference is invited to the Public Notice ref. no. L-1/260/2021/CERC dated 07-09-2021 vide which CERC has circulated draft Central Electricity Regulatory Commission (Deviation Settlement Mechanism and Related Matters) Regulations, 2021 in public and invited comments/ suggestions/objections from the stakeholders and interested persons on the same.

In this regard, our comments are as below:

1. The definition of **‘Time Block DSM Charges’** may be included.
2. Clause 6 (1) may be written as **“Deviation in a time block for general sellers including generating station based on municipal solid waste shall be computed as follows:”**
3. Point (ii) under Column *“Deviation by way of over injection”* against *“For a general seller other than an RoR generating station or a generating station based on municipal solid waste”* in table at Clause 8 (1) may be written as **“@ 110% of the normal rate of charges for deviation beyond 2% Deviation-general seller (in %)”**.
4. Point (ii) under Column *“Deviation by way of under injection”* against *“For WS Seller”* in table at Clause 8 (1) may be written as **“@ 110% of the normal rate of charges for deviation beyond 10% Deviation-WS seller (in %)”**.
5. Clause 8(3)(b) may be rewritten as:

*“The charges for deviation for drawal of start-up power before COD of a generating unit or for drawal of power to run the auxiliaries during shut-down/ **testing activities** of a generating station shall be payable at the normal rate of charges for deviation.”*

6. In regard to clause 10(2), it is stated that the validity period (20 days/ 60 days/ 90 days) may also be indicated.
7. It is to mention that based on the data from multiple sources such as state biomass assessment studies, waste assessment studies, Central Electricity Regulatory Commission Orders, State Electricity Regulatory Commission Orders, and third-party reports, various studies opined that the deviations in calorific values due to unpredictable and heterogeneity nature in waste are approximately within 30% range from the anticipated or assumed average values.

	Low	High	Average	Range of Low and High GCV from Average	
	kcal/kg	kcal/kg	kcal/kg	%	%
Mixed Municipal Waste	1100	2000	1600	-31%	25%
Refuse Derived Fuel	1800	3200	2500	-28%	28%
Agro-Waste/Biomass	2250	4423	3100	-27%	43%
			Average	-29%	32%

Considering the wide range of possible deviations (approx. 30%) in calorific value of waste, there is a likely possibility of deviation of +/- 30% in actual generation from scheduled generation for waste to energy plants.

Therefore, it is requested that

- a. **The deviation limit for levying of zero deviation charge may be kept as 30% instead of 20% for a general seller being a generating station based on municipal solid waste (MSW).**
- b. **Extending of the same exemption to all types of Waste to Energy (WtE) Plants also** as there is also a deviation in calorific values in the range of approximately within 30% due to unpredictable and heterogeneity nature in waste. Further, considering the noble cause of WtE plants to decompose and process the Waste irrespective of its quality it is very essential that they should be promoted and assisted to grow faster to make step towards zero discharge economy and to achieve the very spirit of Gol's prestigious mission i.e. “Swacch Bharat Mission” and “Namami Gange Mission”.

भवदीय/Yours faithfully

अशोक कुमार राजपूत/ (Ashok Kumar Rajput)
मुख्य अभियन्ता (आर टी एवं आई / Chief Engineer (RT&I)